PHASE III SITE CHARACTERIZATION WORK PLAN

Former Aerospace Metals, Inc. Site
500 Flatbush Avenue
Hartford, Connecticut
Docket No. TSCA-01-2006-0060

November 30, 2012 (Revised and Updated to Address EPA Comments on January 10, 2013)

Prepared by

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1.0 INTRODUCTION

The 500 Flatbush Avenue property is a 32-acre parcel located in an area of mixed commercial and industrial use on Flatbush Avenue in Hartford, Connecticut (“the Site”) (Figure 1). The Site was historically used as a scrap metal recycling facility, but has been unused since the tenant, Metals Management Aerospace, Inc. (MTML), ceased operations in 2011. The real estate is owned by Danny Corporation (DC) (Figure 2).

Consent Order Final Agreement (CAFO)

On December 6, 2006, the United States Environmental Protection Agency (EPA) and DC entered into a Consent Order Final Agreement (CAFO) for the Site. The CAFO was subsequently amended on August 12, 2011, and again on July 3, 2012. The 2011 amendment extended the deadline for Phase III Site Characterization scope of work submission to July 1, 2012. The July 3, 2012 amendment extended the deadline for Phase III Site Characterization scope of work submission to December 1, 2012.

CAFO Item 25 contains requirements for an Indoor Characterization Plan (“Phase I Characterization Plan”). Item 26 contains requirements for a Phase I PCB Cleanup Plan. Items 25 and 26 were completed.

Item 27 contains requirements for an Outdoor Unpaved Area Characterization Plan (“Phase II Characterization Plan”). In July 2007, Weston Solutions, Inc. (WESTON) prepared and submitted a Draft Phase II Site Characterization Report for the Site, which satisfied Item 27. The collection of soil samples was not performed by WESTON in the areas listed below, as they were either not the subject of sample collection and analysis under Item 27, or WESTON believed they pose no risk of direct worker contact with PCBs in exposed soil.

- Paved areas or areas covered by buildings or other structures.
- Areas that have previously been remediated by excavation of contaminated soil where the excavated area was backfilled with clean material.
- Areas where worker exposure is limited.

WESTON found low levels of PCBs across much of the Site, with several areas of soil containing elevated PCB concentrations. The sampling results obtained by WESTON are presented on Figures 3, 4, and 5. Each soil sample collected by WESTON is marked in black ink at the nodes of their sampling grid. The WESTON sampling grid is also superimposed on each figure.

Item 28 contains requirements for a Phase II PCB Cleanup Plan. Item 28 was not completed pending the results of a Phase III Site Characterization Plan.

Item 29 contains the requirement to conduct the Phase III Site Characterization Plan for areas not completed during the Phase I or II site characterization plans or areas not already remediated in accordance with 40 CFR §761.61.

CAFO Item 29 (as amended on July 3, 2012)

The following Phase III Site Characterization Work Plan was developed to respond to the requirements of Item 29 (as amended). As such, the Phase III Site Characterization Work Plan addresses the remaining areas not addressed in the WESTON Phase II Site Characterization Report. These include:

- Paved areas or areas covered by buildings or other structures (see Sections 3.1 and 7 of this document).

- Areas that have previously been remediated by excavation of contaminated soil where the excavated area was backfilled with clean material[1].

- Areas where worker exposure was limited.[2]

For the purposes of discussion, the Site has been divided into three functional areas. These include Area S, which encompasses the southern portion of the Site (approximately 10-acres), Area C, which encompasses the central portion of the Site (approximately 12-acres), and Area N, which encompasses the portion of the Site north of the Interstate 84 overpass (approximately 9-acres). The proposed sampling plan completes the WESTON sampling grid site-wide. Proposed sampling locations are marked in green ink on Figures 3, 4, and 5, and represent those grid nodes that were not sampled by WESTON in 2007.

The Phase III Site Characterization Scope of Work was first submitted to EPA on November 30, 2012. EPA commented on the plan in a letter dated January 4, 2013. The revised scope of work is presented in this document, and responds to EPA's January 4, 2013 comments.

[1] Since the 1986 remediation project left PCBs up to 35 ppm in place which exceed the criteria for low- and high-occupancy areas contained in 40 CFR §761.61 (4)(1)(A) and (B), sampling in these areas is now appropriate.

[2] Worker exposure is now limited to transient maintenance and property management only.

2.0 SITE BACKGROUND

The Site was developed in the 1960s as an aerospace and miscellaneous metals recycling facility by AMI. Historical site operations included cutting, crushing, shredding, and packaging of scrap metals for recycling. Area S was used primarily for transportation logistics and container bulk storage. Area C was used for aerospace and transformer metals recycling. Area N was used by a lock manufacturer from the early 1900s to 1960 (the E Building), metals storage (the E Building), and shredding white goods. The AMI business interests were sold to MTML in 2005, and MTML ceased operations and moved to a different location in 2011. The Site has not been used since 2011.

Buildings and structures present at the Site include:

Area S

The former Container Bulk Storage (CBS Building)
The former Guard Shack

Area C

The former Aerospace Parts Building (APS) Building
The former Main Building
Various sheds and scrap staging areas on asphalt or pavement

Area N

The former E Building
The remains of the former Shredder

None of the buildings are currently occupied.

The Site layout and existing conditions are illustrated on Figures 2, 3, 4, and 5. From early 2011 to the present, the Site has been vacant, and secured within the fenced and locked boundaries of the Site.

Surrounding properties include an active rail line to the west, the Flatbush Avenue on/off ramps from Interstate Highway 84 (I-84) to the east, commercial (re-developed former industrial) properties to the west, and a scaffolding company to the south. An elevated section of I-84 passes between Parcel C and N, and an easement in favor of DC provides access to Parcel N from parcel C.

Environmental Investigation Activities

Numerous environmental studies and several remediation projects have been conducted during the past 20-years. The associated reports were documented in the Work Plan prepared by WESTON in 2006, and in the Environment Condition Assessment Form (ECAF) which was submitted to the State of Connecticut Department of Energy and Environmental Protection (DEEP) in 1998.

DEEP issued Consent Order WC No. 4921 to DC (then doing business as Aerospace Metals, Inc.) on 8 February 1990, to resolve a Notice of Violation (NOV) for the discharge of oil-laden water observed at two locations along the eastern boundary of the Site. The Consent Order required DC to investigate the two discharge areas and install interceptor trenches to contain and recover the oily water seepage (the Northern Interceptor Trench and Southern Interceptor Trench). Details of the remediation and effectiveness of the interceptor trench system were provided in the EPA-approved Work Plan submitted at that time.

The oil phase was historically separated from the water phase collected from the interceptor trench system, and temporarily staged on-site in drums prior to disposal. Waste characterization analyses performed on the oil phase detected PCBs in concentrations ranging between 140 and 430 milligrams per liter (mg/L). Oil phase waste met the definition of PCB waste and was shipped off-site as PCB-regulated waste for disposal at a Toxic Substances Control Act (TSCA)-permitted disposal facility.

Currently, only the Northern Interceptor Trench is in operation. Since 2005, no oil flow has been observed in the Southern Interceptor Trench, and only sporadic sheens are visible as droplets in the discharge to the Northern Interceptor Trench. A trailer mounted system was installed at the Site in early-2011 to facilitate oil separation from the discharge prior to discharge to Kane Brook under permit. Since June 30, 2011, the treated effluent has been discharged to Kane Brook under a permit issued by DEEP on September 1, 2012 (Permit GRS000126).

Soil Sampling Data

Soil sampling data are presented in exhaustive detail in other documents. In the late 1980s, Fuss & O'Neill conducted a sampling effort and determined that shallow soils beneath the former APS Building yard were impacted with elevated PCB concentrations. The sampling effort resulted in a large scale excavation of impacted soils under DEEP supervision. At that time, 35 ppm was used as the clean-up criteria for this area. Despite the criteria established, nearly all of the impacted soil that was encountered was removed and disposed off-site. The approximate boundaries of the remediation areas are illustrated on Figures 2, 3, and 4.

In 2006, WESTON conducted the Phase II Site Characterization, and collected composite and grab soil samples from grid nodes throughout the Site. The resulting data collected by WESTON identified two areas where elevated PCB concentrations were identified including a portion of the Container Storage Area (CSA) Area and soils along the slope of the eastern drainage swale and directly east of the former PCB remediation area.

The source of PCBs and petroleum that are collected by the northern interceptor trench remains unknown. Anecdotal observations made by DC over time suggest that a source of PCBs and petroleum may remain beneath the paved access road that runs south to north along the eastern portion of the Site.

Groundwater Sampling Data

Due to the perceived nature of the Site hydrology and hydrogeological model by WESTON, groundwater sampling using an installed groundwater monitoring well system was not performed in 2007. STANTEC installed and sampled groundwater monitoring wells in 2012. The resulting data suggest that PCBs are not present in groundwater over the majority of the Site.

PCB Electrical Equipment

No PCB-containing electrical equipment is in use at the Site nor remains from historical operations. According to DC, the last remaining PCB-containing equipment to be recycled at the Site was removed in 1980.

Existing Drainage Structures

Drainage and liquid collection structures exist in the Main building and include concrete lined pits, sumps, and trenches. These structures have been cleaned to remove metal scraps and residual petroleum. The interceptor trench system remains in place. However, neither petroleum nor PCB materials have been observed entering the southern interceptor trench since 2005. A reduced volume of petroleum containing PCBs have been observed in the northern interceptor trench since 2005. As discussed, only the Northern Interceptor Trench system remains in operation.

Catch basins exist in paved portions of the Site and discharge to the drainage swale and ultimately Kane Brook through the storm water drainage system. Catch basins appear clean and un-impacted.

In 2012, a new drainage system was installed along the rail right-of-way as part of the new Busway Project. We expect that the new system will reduce storm water flow infiltration up-gradient of the Site. Such a decrease in storm water infiltrate may or may not reduce groundwater flow volumes at the Site. Consequently, the volume of impacted groundwater entering the North Interceptor Trench may or may not be reduced.

Geology

The majority of the property was developed on sandy granular artificial fill ranging in thickness from 2 to 20 feet that was placed on top of a thick (over 100 feet) sequence of low permeability glacio-lacustrine clay. The clay layer has been observed at shallow depths ranging from 3 to 10 feet below grade (fbg) in the South Yard portion of the Site. No bedrock outcrops were observed in the vicinity. Based on the local geology and work completed by STANTEC on nearby properties, no bedrock is suspected near the surface. Typically, this section of Hartford is underlain by the massive, low permeability, Lake Hitchcock clay unit that forms a very effective barrier to vertical contaminant and groundwater flow.

Groundwater Resources

The property and surrounding properties are provided with municipal water and sewage service. No water supply wells have been identified in the vicinity of the Site or the surrounding area. DEEP has classified groundwater on the Site and surrounding area as “GB”, which is presumed to be of a quality not suitable for direct human consumption without treatment due to long-term infiltration of contaminants from overlying urbanized land uses. Designated uses of GB groundwater include industrial process and cooling waters and base flow for hydraulically connected surface water bodies.

The local water table is perched on top of the thick clay sequence, and flows in an easterly direction. The perched groundwater is typically present in shallow depressions in the clay surface and usually flows at an increased rate after periods of heavy precipitation. The irregularities in the underlying clay surface have channelized groundwater flow. These channels discharge at several seepage areas along the drainage swales located on the eastern perimeter of the South Yard

Drainage Areas. The swales drain to adjacent drainage areas or flow north into Kane Brook. Kane Brook is piped below I-84 and discharges into a channel before flowing to the Park River, located approximately 500 feet east of the Site.

The hydraulic conductivity of the native clay is estimated to be typical of silty-clay and clay materials (if saturated) and around 10^{-4} to 10^{-5} ft/sec. As such, pore water contained in such a deposit may not readily flow.

Surface Water

The nearest surface water body is Kane Brook, situated several hundred feet to the northeast. Kane Brook discharges directly to the Park River. The Park River is channelized at its confluence with Kane Brook. The channelized Park River then enters an underground concrete and masonry channel shortly after its confluence with Kane Brook, and then discharges directly to the Connecticut River. As such, other than the short drainage channel of the Brook until it reaches the Park River, storm water originating at the Site first enters the natural environment at the Connecticut River, immediately south of the Whitehead Highway. Therefore, storm water at the Site is subject to dilution as it enters the natural environment.

Wetlands

The nearest wetland type land is located immediately east of the drainage swale at the east-side of the Site. While wetland delineation has not been performed in this area, STANTEC suspects that limited amounts of wetland soil exist in this area. The suspected wetland area is isolated from the surrounding natural environment, and appears to have been created by the local drainage system when the Site and I-84 were developed.

Conceptual Site Model

STANTEC has developed a Conceptual Site Model (CSM) for the Site. The CSM is based on historical soil sampling data, site observations, and discussions with Site personnel. Elements of the CSM are presented below.

Soil

Soil at the Site has been impacted by low levels of PCBs, petroleum, and Poly Aromatic Hydrocarbons (PAHs) in many locations. Releases of PCBs were caused by handing and recycling PCB-containing electrical equipment for many years. As a result, low levels of PCBs exist in soils. Elevated levels of PCBs were removed during soil excavation activities completed in the former APS Building yard in the late 1980s under DEEP approval. Soils excavated and disposed off-site during that effort used 35 ppm as the clean-up goal. Notwithstanding, most impacted soils in this area were excavated down to clay, and we anticipate that remaining PCBs in soils in this area are far below 35 ppm.

Surficial soil sampling conducted by WESTON in 2007 identified three areas where the potential for PCBs exist at or above 10 ppm. These are illustrated on Figures 4 and 5, and located adjacent to the PCB remediation area and adjacent to the paved access road (on Parcel C), and adjacent to the shredder (Parcel N).

Petroleum hydrocarbons and PAHs also exist in soils above the DEEP's GB Pollutant Mobility Criteria (GB PMC) and Industrial/Commercial Direct Exposure Criteria (ICDEC) beneath the Main

Building and paved areas east of the main building.

Petroleum and PCB-containing groundwater collected in the northern interceptor trench indicate that some of this material is mobilized during storm events. The specific source of PCBs collected in the interceptor trench has not yet been determined, but may be an as yet unidentified source beneath the paved access road.

Overall, PCB-concentrations in surficial soil across much of the Site are <10 ppm with the potential for isolated hot spots containing PCBs >10 ppm.

Groundwater

Groundwater at the Site may be largely transient and exist mostly as infiltrate after storm events. While clay deposits beneath the Site are expected to contain pore water, pore water appears to be insufficient to allow flow through the clay. As such, the clay appears to be an exceptional barrier to vertical contaminant migration. After storm events, and in certain drainage areas near the northern interceptor trench, groundwater flows as infiltrate along the surface of the clay. When the infiltrate drains off, groundwater flow is greatly reduced.

Groundwater, as infiltrate, continues to mobilize small quantities of petroleum and PCBs, which are collected in the northern interceptor trench. Analysis of the effluent has conclusively demonstrated that petroleum and PCBs are not solubilized in groundwater, and groundwater meets effluent discharge limitations for discharge to nearby Kane Brook.

In summary, groundwater is largely not impacted by dissolved phase petroleum, PAHs, metals, and PCBs. Groundwater is, however, affected by the mobilization of petroleum and PCBs, which exist only as a sheen entering the northern interceptor trench. Recent data illustrate that approximately 5-gallons of petroleum and PCBs are collected every two months on approximately 30,000-gallons of water. Thus, the volume of petroleum and PCBs that is mobilized by groundwater is very low.

Based on the CSM, it appears that if storm water infiltrate was eliminated, the mobilization and discharge of petroleum/PCBs to the northern interceptor trench would also be eliminated in its entirety.

2.1 Phase III Sampling Work Plan

This sampling work plan will guide the collection and analysis of soil and concrete samples from building interiors (porous surfaces) during the Phase III Site Characterization project. The Phase III Site Characterization Work Plan will also discuss the future disposition of the buildings, and additional sampling that will occur when porous and non-porous building materials are demolished as part of future re-development (Sections 7 and 8).

The Phase III Site Characterization work plan details sampling point selection, data collection methods, sample management, decontamination procedures, health and safety issues, project logistics, data gaps with respect to the Site, document management, and the schedule for investigation.

2.2 Project Organization

STANTEC is managing the Phase III Site Characterization project for DC. Soil analysis will be performed by Alpha Analytical, Inc.

2.3 Current Site Conditions

Currently, the Site is unoccupied and there are no regular workers that occupy the Site. The Site and buildings are periodically accessed by maintenance and property management personnel. As discussed, the buildings are unused and there are no tenants at the Site.

3.0 SAMPLING GRID

3.1 Sampling Grid Design

Sampling will be conducted using the sampling grid that WESTON designed and used for their Phase II ESA. Specifically, samples will be collected as grab samples from those nodes that WESTON did not collect samples from. The resulting data set will provide sample point for the entire site including paved areas or areas deemed as low risk of exposure by WESTON.

As discussed, proposed sampling locations are marked in green ink on Figures 3, 4, and 5, and represent those grid nodes that were not sampled by WESTON in 2007.

3.2 Sampling Stations

Samples will be collected from each location as a grab sample composited from 0- to 3-inches. Should the sampling node coincide with concrete or asphalt, the concrete or asphalt will be removed prior to sample collection.

In a few instances, a sampling node may be located just beyond or just inside a building. In those instances, a sample will be collected near the node and on the property or just outside a building because such data will be useful for site characterization.

3.3 Porous Surfaces (Interior Concrete)

Limited concrete sampling will be conducted inside each building which has not yet been evaluated. Due to the small size of the CBS Building (Parcel S), concrete samples will be collected in a simple grid consisting of 8 sampling stations (Figure 3). In the Main and E Buildings (Figures 4 and 5, respectively), samples will be collected at the grid node intersections using the WESTON sampling grid. In the Maintenance Building (Parcel C/Figure 4), concrete will be sampled using the WESTON grid node intersections.

Concrete samples will be collected as a composite of concrete from 10-12 closely spaced holes drilled using a pneumatic hammer in a one square foot area at each station. Samples will be collected from 0 to 0.5-inches.

Concrete in the APS building will not be evaluated because concrete sampling has already been conducted in that building.

4.0 SAMPLING PROCEDURES

4.1 Sampling Protocol

Soil and concrete samples will be collected with steel spades, shovels, a pneumatic hammer, and other hand tools. Where possible, samples will be collected with disposable plastic scoopulas. If hand tools need to be re-used, the tools will be decontaminated between sampling points using the decontamination procedures specified in 40 CFR §761. Each location will be backfilled to the surface with sand.

4.3 Health & Safety Plan

The sampling will be completed under a Health and Safety Plan (HASP) that complies with the Occupational Safety and Health Administration (OSHA) 1910.120 (Hazardous Waste Operations)(HAZWOPER) standard. The HASP will be reviewed by the field team prior to sampling. The HASP will be signed daily by the field personnel working on the project.

4.4 Sampler Exposure

Based on our experience, sampling PCB impacted soils with hand tools does not result in significant exposure to PCBs. On a similar project conducted in West Hartford, STANTEC retained Smith & Wessel Associates (SWA) to conduct a Negative Exposure Assessment (NEA) for samplers collecting samples from concrete using powered pneumatic hammer drills. During the NEA, personal air samplers were used to collect air in the worker breathing zone. Samples were analyzed for airborne PCBs using National Institute of Occupational Safety and Health (NIOSH) Method 5503. PCBs were not detected above analytical detection limits. STANTEC views concrete sampling as much more likely to result in worker exposure to airborne PCBs. As such, the existing NEA performed by SWA is likely to represent a worse case than soil sampling and is thus suitable for determining that respiratory protection is not needed for sampling. Should EPA wish to review the NEA, STANTEC will provide the NEA upon request.

4.5 Sample Containers

Samples will be containerized in the field in 4 oz. amber jars with wide mouth necks. If necessary, grab samples will be homogenized before they are containerized in food grade high density polyethylene (HDPE) disposable bowls and scoops. If the samples can be homogenized in the sample containers, then a separate field homogenization step may not be necessary. The field team will determine the need for additional homogenizing during sampling.

4.6 Investigation Derived Waste

Investigation derived wastes (IDW) including gloves, sampling scoops, bowls, decon rinsewater, and other wastes generated during the course of sampling. If all sample results contain PCBs below 1 mg/kg, then the IDW will be disposed as non-regulated solid waste. If samples contain PCBs above 1 mg/kg, then the IDW will be containerized and disposed off-site as TSCA remediation wastes. We anticipate that less than three 55-gallon drums of IDW will be generated during the sampling project.

The IDW drums will be secured in an enclosed and locked building and labeled with the M_L mark. The drummed waste will be disposed according to PCB sample concentration. We will segregate IDW for each functional area (S, C, and N) because we suspect that samples from Areas S and C may not contain PCBs above 1 ppm.

4.7 Team Logistics

The sampling team will consist of up to three personnel. Each samplers will be responsible for removing asphalt with hand tools if necessary, sample collection, sample labeling, sample transport and management, and record keeping.

After sample collection, all samples will be immediately placed in a cooler and stored at 4 degrees Celsius prior to delivery to the laboratory.

In those areas where concrete may need to be penetrated, STANTEC will retain a concrete coring sub-contractor to remove concrete. The sub-contractor will be HAZWOPER trained. Coring equipment will be decontaminated between sampling locations and at the end of the job as described in Section 4.9

4.8 Sample Management, Delivery and Analytical Methods

At the end of each sampling shift, samples will be transported to the laboratory by courier. The samples will remain under custody of the lab courier until they are relinquished to the lab for analysis.

Each grab sample will be submitted for PCB analysis by EPA Method 8081 using the Soxhlet extraction procedure (EPA Method 3540C).

4.9 Decontamination Procedures

All equipment that comes into contact with sample media will be thoroughly decontaminated after each use to prevent sample cross-contamination. Decontamination procedures will include washing equipment with a stiff bristle brush in a detergent and water solution, rinsing with tap water, rinsing with pesticide grade laboratory hexane (20 ng/L impurities or less), and air drying. Care will be taken to avoid contaminating the drilling bits between sampling locations.

5.0 SAMPLE IDENTIFICATION AND CHAIN OF CUSTODY

5.1 Sample Identification

A sample identification (ID) code consisting of up to 4-characters will be used to uniquely identify each sample. A unique ID code for each sample is required to adequately identify the location of each sampling point and prevent the sample identifier from being used for more than once. The ID codes will consist of a grid line identifier (A, B, C, D, E, etc.), and number.

5.2 Quality Control Sample Designations

Those samples to be collected for quality control will be determined in the field and selected randomly. Samples submitted for quality control as duplicates will be numbered Dup-1, Dup-2, Dup-3, etc. The duplicates will be submitted as blind duplicates. The location of each duplicate will be logged in the field notebook but not disclosed to the laboratory.

Samples submitted as Matrix Spike/Matrix Spike Duplicates (MS/MSDs) will be designated MS/MSD in the comments section of a particular sample location.

One Performance Evaluation (PE) sample will be submitted to the lab for analysis. The PE sample will be obtained from a source used for environmental quality control analysis. The PE sample will be designated PE-1. The reference concentration will not be disclosed to the laboratory.

5.3 Chain of Custody

Each sample will be logged on a chain of custody (COC) for submittal to the laboratory for analysis. All Samples will be designated as grab samples.

The sampling team will designate all samples for 5-day turnaround time (TAT).

The sampling team will mark all COCs as requiring a Connecticut Reasonable Confidence Protocol (RCP) report.

MS/MSDs will be noted in the comments section of each chain of custody.

6.0 DOCUMENT MANAGEMENT

Documentation is an essential part of the sampling work plan. Documentation for the sampling activities will include daily logs, sample labels, HASP checklists, sample photographs (if appropriate), and COCs.

6.1 Sample Container Labels

Waterproof, gummed labels obtained from the laboratory will be used to identify sample containers. Each sample will be labeled immediately upon collection and include the following information: sample ID number, the name of the project, sample location, and requested analysis type. The sample date, time, and sampler's initials will be recorded during field sampling. The lid of each container will also be marked to provide a secondary means of sample identification should labels fall off of the containers.

6.2 Logbooks

Each sampling team will maintain a logbook to record sample data such as time, date, sample location, QC sample locations, and sample observations if any (e.g. staining or odors). Each page of the logbooks will be signed by the individual recording information in the logbook. At the end of the project, the logbook data will be appended to the report as an appendix.

7.0 DATA GAPS

The Phase III Site Characterization work plan responds to Items 27 and 29 of the CAFO and includes those areas that were not subject to sampling under WESTON's Phase II ESA. However, the Phase III Site Characterization Work Plan will not generate data necessary for the development of a Site-wide Remedial Action Plan (RAP) nor satisfy all of the requirements of DEEP's 2006 Site Characterization Guidance Document (SCGD).

Three-dimensional site characterization, in a manner that is sufficient to develop a RAP, will be conducted as part of the site redevelopment process. Since soil disturbance is planned as part of the Busway access road construction project (start April 2013), three-dimensional site characterization will be conducted in accordance with the SCGD before road construction activities begin. We anticipate that three dimensional site characterization (in proposed soil disturbance areas related to the Busway) will occur during the first quarter of 2013.

The Phase III Site Characterization Work Plan will not fully address porous and non-porous surfaces including buildings, steel, and other structural building components. Buildings and other structures will be evaluated prior to off-site disposal as bulk PCB remediation wastes, should they contain PCBs. The preliminary data collected during the Phase III site characterization plan will serve to provide a basic data for porous and non-porous surfaces. Further evaluation of porous and non-porous surfaces will be conducted when the buildings are scheduled for demolition.

The Phase III Site Characterization Work Plan does not include groundwater, surface water, or sediment. An evaluation of other environmental media will be required before a RAP is developed.

8.0 PROPOSED SCHEDULE

DC will continue to discuss the schedule with EPA.

APPENDIX A

Weston Solutions, Inc. Draft Phase II Site Characterization Report, July 2007